



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 21, 2022

**BY ECF**

Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Joshua Adam Schulte,*  
S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter pursuant to the Court's order, dated February 15, 2022 (D.E. 711), directing the Government to provide an update with respect to certain matters by today.

*How MDC will allow Defendant to transfer typed documents from his laptop to standby counsel and the Court given BOP's regulations prohibiting Defendant from possessing a CD/DVD writer, as well as whether Defendant may be provided with a pen.*

The Government has discussed the defendant's ability to print documents from his discovery laptop with the legal department at the Metropolitan Detention Center ("MDC"), who in turn has discussed the matter with the Special Administrative Measures ("SAMs") unit staff. We have asked MDC both about transferring files from the defendant's discovery laptop to a printer-connected computer as well as whether the defendant's laptop can be directly connected to a printer. MDC reports that the defendant cannot transfer documents from his laptop to another computer connected to a printer, both as a logistical matter (given BOP policy prohibiting inmates from using disc burners) and as a matter of network and computer security. MDC also reports that the defendant cannot connect his discovery laptop directly to a printer. The defendant can prepare documents on a word processing program on the computer in the SAMs unit, and can print from that computer.

The Government has also asked about providing the defendant with a pen. We have not yet confirmed this matter with MDC and, in light of today's federal holiday, respectfully request leave to update the Court tomorrow.

*Whether Defendant currently has access to the MDC law library during the national lockdown; how long the lockdown is anticipated to continue; and what steps will be taken to ensure Defendant has regular access to the law library*

The defendant, like other inmates in the unit, has not been able to access the unit computer, which houses a legal research database for the use of SAMs inmates, during the lockdown. The Government is currently unable to confirm the status of the lockdown and, in light of today's federal holiday, we respectfully request leave to update the Court tomorrow.

*After consulting with the FBI, whether there is a 500 GB hard drive in the SCIF to which Defendant should have access, see ECF No. 682, at 3*

As described in prior letters and conferences, discovery from the defendant's home desktop computer is currently stored on a single hard drive stored in a safe within the courthouse SCIF in order to comply with Adam Walsh Act protections, given the presence of child pornography on the defendant's computer. The defendant's assertion may refer to his home computer having multiple internal hard drives, but those hard drives comprise a single digital evidence item that is contained on the hard drive in the SCIF safe.

Respectfully submitted,

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by: /s/  
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cc: Standby counsel (by ECF and email)  
Joshua Adam Schulte (by mail)